

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK**

ROBERT TOMASSINI, on behalf of
himself and others similarly situated,

Plaintiff,

VS.

CHRYSLER GROUP LLC (n/k/a FCA US LLC),

Defendant.

Case No. 3:14-cv-01226-MAD-DEP

Hon. Mae A. D'Agostino
United States District Judge

PLAINTIFF'S NOTICE OF MOTION FOR CLASS CERTIFICATION

PLEASE TAKE NOTICE THAT, for the reasons set forth in the Memorandum of Law in Support of Plaintiff's Motion for Class Certification, and the exhibits attached thereto, Plaintiff respectfully requests that the Court enter an Order:

- (1) Certifying the following proposed Class pursuant to Fed. R. Civ. P. 23(b)(2) and (b)(3),
and in the alternative 23(c)(4):

All persons who purchased and/or leased Chrysler and Dodge minivans that were manufactured from after June 10, 2009 until May 25, 2010, in the State of New York.

- (2) Appointing Plaintiff Robert Tomassini as Class Representative for the Class;

- (3) Appointing attorneys at the Law Offices of Elmer Robert Keach, III, P.C., Migliaccio & Rathod LLP, Kantrowitz Goldhamer & Graifman, P.C, Whitfield Bryson & Mason LLP, and Parker Waichman LLP as Class Counsel; and

- (4) Ordering such further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE THAT this motion is returnable before the Court on March 6, 2018 at the James T. Foley United States Courthouse at 445 Broadway Street, Albany, NY 12207. Responding papers must be served pursuant to prior orders of this Court and the Court's Local Rules.

Dated: January 25, 2018

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 25th of January, 2018, a true and complete copy of the foregoing Plaintiff's Motion for Class Certification was served via the Court's ECF system to the following:

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